

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOSEPH BOND, on behalf of himself and
others similarly situated,

Plaintiff,

v.

FOLSOM INSURANCE AGENCY LLC,
CODY FOLSOM, and BERKSHIRE
HATHAWAY HOMESTATE COMPANIES

Defendants.

:
: CIVIL ACTION FILE NO.
: 3:24-CV-02551-L

:
:
: **JURY TRIAL DEMANDED**

**[PROPOSED ORDER GRANTING]
MOTION TO COMPEL FOLSOM INSURANCE AGENCY LLC
TO PROVIDE DISCOVERY RESPONSES
AND FOR SANCTIONS**

AND NOW, this _____ day of _____, 202____, upon consideration
of the Plaintiff's Motion to Compel and for Sanctions, this Court does hereby ORDER,
DECREE, and ADJUDGE:

- Defendant is ordered to produce unredacted copies of the "broadcast reports" it produced to permit the Plaintiff to conduct expert analysis, including for the purposes of class certification.
- Plaintiff has demonstrated that sanctions under Rule 37 are warranted, owing to the willful disobedience of the Court's prior orders on compelling such information and bifurcation.

- The Plaintiff has suffered extreme prejudice by the non-production of such information, including through the delay in proving up requirements for class certification under Rule 23 and necessitating the filing of the instant motion.
- Counsel for Plaintiff shall file a bill of costs outlining the final attorneys' fees and costs surrounding the Plaintiff's motion.
- After notice and an opportunity to be heard on such fees and costs, Defendant is ordered to pay the sanctions as outlined in Plaintiff's subsequent bill of costs directly to counsel for Plaintiff within 30 days.

J.